

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

DAVID DIXON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 4:19-CV-0112 AGF
	)	
CITY OF ST. LOUIS, et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' RENEWED MOTION FOR PRELIMINARY INJUNCTION**

For the reasons stated in Plaintiffs' Memorandum in Support of Plaintiffs' Renewed Motion for Preliminary Injunction, Plaintiffs respectfully move this Court to issue a class-wide preliminary injunction against Defendant Commissioner Dale Glass that restrains him from enforcing unconstitutional orders of detention.

Pursuant to Local Rule 78-4.02(B), Plaintiffs request that the Court hold a hearing on Plaintiffs' motion where oral argument and, if necessary, evidence may be presented. In light of the constitutional interests asserted, Plaintiffs believe that oral argument is warranted and will aid the Court's disposition of Plaintiffs' motion.

Dated: April 13, 2020

Respectfully Submitted,

INSTITUTE FOR CONSTITUTIONAL  
ADVOCACY AND PROTECTION

/s/ Robert Friedman

Seth Wayne (D.C. Bar No. 888273445,  
Federal Bar No. 888273445) (admitted pro hac  
vice)

Robert Friedman (D.C. Bar No.1046738,  
Federal Bar No. 5240296NY) (admitted pro  
hac vice)

Mary B. McCord (MBE #41025MO,  
Federal Bar No. 427563DC) (admitted pro hac  
vice)

Georgetown University Law Center  
600 New Jersey Ave. NW  
Washington, D.C. 20001  
Tel: 202-662-9042  
sw1098@georgetown.edu  
rdf34@georgetown.edu  
mbm7@georgetown.edu

ARCHCITY DEFENDERS, INC.

/s/ Jacqueline Kutnik-Bauder  
Blake A. Strobe (MBE #68422MO)  
Michael-John Voss (MBE #61742MO)  
Jacqueline Kutnik-Bauder (MBE # 45014MO)  
John M. Waldron (MBE #70401MO)  
Maureen Hanlon (MBE #70990MO)  
440 N. 4th Street, Suite 390  
Saint Louis, MO 63102  
855-724-2489  
314-925-1307 (fax)  
bstrobe@archcitydefenders.org  
mjvoss@archcitydefenders.org  
jkutnikbauder@archcitydefenders.org  
mhanlon@archcitydefenders.org  
jwaldron@archcitydefenders.org

ADVANCEMENT PROJECT

/s/ Thomas B. Harvey  
Thomas B. Harvey (MBE #61734MO)  
(admitted pro hac vice)  
Miriam R. Nemeth (D.C. Bar No. 1028529)  
(pro hac vice application forthcoming)  
1220 L Street, N.W., Suite 850  
Washington, DC 20005  
Tel: (202) 728-9557  
Fax: (202) 728-9558  
tharvey@advancementproject.org  
mnemeth@advancementproject.org

CIVIL RIGHTS CORPS

/s/ Alec Karakatsanis  
Alec Karakatsanis (D.C. Bar No. 999294)  
(admitted pro hac vice)  
910 17th Street NW, Suite 200  
Washington, DC 20006  
Tel: 202-599-0953

Fax: 202-609-8030  
alec@civilrightscorps.org

*Attorneys for Plaintiffs*